

TSD File Inventory Index

Date: JUNE 25 2012
Initial: S. H. Davis

Facility Name: Midwest Generation (LLC) (Crawford Generating Station)
Facility Identification Number: ILD 044 231 470 (Two folder site)

A.1 General Correspondence		.8 RFI Progress Reports	
A.2 Part A / Interim Status	X	.9 Interim Measures Correspondence	
.1 Correspondence	X	.10 Interim Measures Workplan and Reports	
.2 Notification and Acknowledgement	X	D.3 Corrective Action / Remediation Study	
.3 Part A Application and Amendments	X	.1 CMS Correspondence	
.4 Financial Insurance (Sudden, Non Sudden)		.2 Interim Measures	
.5 Change Under Interim Status Requests		.3 CMS Workplan	
.6 Annual and Biennial Reports		.4 CMS Draft / Final Report	
A.3 Groundwater Monitoring		.5 Stabilization	
.1 Correspondence		.6 CMS Progress Reports	
.2 Reports		.7 Lab Data, Soil-Sampling / Groundwater	
A.4 Closure / Post Closure		D.4 Corrective Action Remediation Implementation	
.1 Correspondence		.1 CMI Correspondence	
.2 Closure / Post Closure Plans, Certification, etc.		.2 CMI Workplan	
A.5 Ambient Air Monitoring		.3 CMI Program Reports and Oversight	
.1 Correspondence		.4 CMI Draft / Final Reports	
.2 Reports		.5 CMI QAPP	
B.1 Administrative Record		.6 CMI Correspondence	
B.2 Permit Docket		.7 Lab data, Soil Sampling / Groundwater	
.1 Correspondence		.8 Progress Reports	
.2 All Other Permitting Documents (Not Part of the ARA)		D.5 Corrective Action / Enforcement	
C.1 Compliance - (Inspection Reports)		.1 Administrative Record 3008(h) Order	
C.2 Compliance / Enforcement	X	.2 Other Non-AR Documents	
.1 Land Disposal Restriction Notifications		D.6 Environmental Indicator Determinations	
.2 Import / Export Notifications		.1 Forms/ Checklists	
C.3 FOIA Exemptions - Non-Releasable Documents	/	E Boilers and Industrial Furnaces (BIF)	
D.1 Corrective Action / Facility Assessment		.1 Correspondence	
.1 RFA Correspondence		.2 Reports	
.2 Background Reports, Supporting Docs and Studies		F Imagery / Special Studies	
.3 State Prelim. Investigation Memos		G.1 Risk Assessment	
.4 RFA Reports		.1 Human / Ecological Assessment	
D.2 Corrective Action / Facility Investigation		.2 Compliance and Enforcement	
.1 RFI Correspondence		.3 Enforcement Confidential	
.2 RFI Workplan		.4 Ecological - Administrative Record	
.3 RFI Program Reports and Oversight		.5 Permitting	
.4 RFI Draft / Final Report		.6 Corrective Action Remediation Study	
.5 RFI QAPP		.7 Corrective Action / Remediation Implementation	
.6 RFI QAPP Correspondence		.8 Endangered Species Act	
.7 Lab Data, Soil-Sampling / Groundwater		.9 Environmental Justice	

Comments: Two folder site

Total Folders: 2

file
Approved for Release by NSA on 08-26-2013 pursuant to E.O. 13526
GSA/NIC/0249EPA/OT

0316005761

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
- ☒ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____
- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see Instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Boiler and/or Industrial Furnace
- ☐ 1. Smelter Deferral
- ☐ 2. Small Quantity Exemption
- Indicate Type of Combustion Device(s)
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

C. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
- ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
- ☐ a. Utility Boiler
- ☐ b. Industrial Boiler
- ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
- ☐ a. Transporter
- ☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Process
- ☐ b. Re-refine

B. Universal Waste Activity

- ☐ 1. Large Quantity Handler of Universal Waste

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☒ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s)) ☒
- D 0 0 4 D 0 0 7 D 0 0 8 D 0 1 8

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1 F 0 0 1	2 F 0 0 2	3 F 0 0 3	4 F 0 0 4	5 F 0 0 5	6
7 	8 	9 	10 	11 	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1 	2 	3 	4 	5 	6
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X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (Type or print)

Date Signed

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

001105 AUG 25 80

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)Commonwealth Edison Co
Crawford Gen. Sta.

I. NAME OF INSTALLATION

CRAWFORD GENERATING STATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 PO BOX 767, ROOM 1700E

CITY OR TOWN

CHICAGO

ST.

ZIP CODE

IL 60690

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

53501 SOUTH PULASKI

CITY OR TOWN

CHICAGO

ST.

ZIP CODE

IL 60623

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

HEMMINGER THOMAS

PHONE NO. (area code & no.)

312-294-4433

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

COMMONWEALTH EDISON COMPANY

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

1LD044231470

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001 23 - 26	2 F002 23 - 26	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

J. W. Johnson

NAME & OFFICIAL TITLE (type or print)

J. W. Johnson
Vice President

DATE SIGNED

JW 8/14/80

CONTINUATION SHEET

ITEM IV DIRECTOR OF WATER QUALITY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

orig to PA
copy to notif

DATE: 1/04/82

5WMB

RE: Installation Name Commonwealth Edison Co. Crawford Generating Station

Installation Address 72 W. Adams St. - Chicago, IL

EPA ID# TID 044 231 470 9 TSD PA

FROM: Regulatory Analysis and Information Section

TO: Gene Meyer, Chief
Technical Programs Section

NO ACTION TAKEN
PENDING DECISION ON WITHDRAWAL
BY EPA STAFF

DATE 4/21/82

Attached for your review is a copy of Letter requesting
withdrawal of Crawford Generating Station's TSD
Permit Application
for the above-referenced facility.

Cover letter date 12/22/81

Rec'd in Region 12/29/81

Rec'd in RAIS 12/29/81

Action required Withdrawal of Part A permit application

Reviewer's summary: The policies stated in the USEPA
letter (which I have enclosed) clearly exclude
the company's waste from regulation at this time
G. Arusha 1/15/82

PLEASE RETURN THIS FORM ALONG WITH ALL RELATED MATERIAL TO
DENISE BAKER



Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

December 22, 1981

RCRA Activities
Region V
P.O. Box A3587
Chicago, Illinois 60690

Subject: Notification of Unnecessary
Permit Application
Crawford Generating Station
EPA Facility I.D. #ILD044231470 *OK g TSD PA*
WGP 1-4-82

To Whom it May Concern:

This letter is to inform you that Crawford Generating Station has filed an unnecessary Hazardous Waste Permit Application, Part A of EPA's Consolidated Permit Application. The Company is informing the EPA that a permit application for this facility has been unnecessarily filed in order to eliminate unneeded inspections of facilities which are not subject to the regulations. We are taking this action with the clear understanding that, should the RCRA regulations be modified such that these or other of Commonwealth Edison's facilities are considered to be treatment, storage or disposal facilities prior to the termination of the interim status period, interim status will be available to these facilities in accordance with 40 CFR Section 122.22(a).

This station thermally treats boiler cleaning waste by injecting the waste into the fire side of the boiler along with the coal. Since this process results in the waste being co-treated with flyash and bottom ash, this process is exempt under 40 CFR Section 261.4 according to the letter of January 13, 1981 from Gary N Dietrich, Associate Deputy Assistant Administrator for Solid Waste to Paul Emler, Jr., Chairman of the Utility Solid Waste Activities Group.

RECEIVED

DEC 29 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

RECEIVED
12/29/81

Because this process is exempt, Crawford Generating Station is not a hazardous waste treatment facility; Commonwealth Edison wishes to withdraw its hazardous waste permit application. Should you have any questions, Angela Jankousky will be pleased to answer them at 312/294-4458.

Sincerely,

A handwritten signature in dark ink, appearing to read "JW Johnson", written in a cursive style.

James W. Johnson
Vice President

1643a
ALJ:JWJ:ds



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD044231470

REACKNOWLEDGEMENT

INSTALLATION ADDRESS

COMMONWEALTH EDISON CO CRAWFORD GEN STA
PO BOX 767 ROOM 1700 E
CHICAGO IL 60690

3501 SOUTH PULASKI
CHICAGO IL 60623

08/19/81

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px; font-family: monospace; font-size: 1.2em;"> ILD0442314703 </div>
LABEL ITEMS EPA I.D. NUMBER FACILITY NAME FACILITY MAILING ADDRESS FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE	

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	CRAWFORD GENERATING STATION
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IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
ENGBERG, JAMES, STATION SUPT.	312 247 7272

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3501 SOUTH PULASKI			
B. CITY OR TOWN		C. STATE	D. ZIP CODE
CHICAGO		IL	60623

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
3501 SOUTH PULASKI			
B. COUNTY NAME		C. CITY OR TOWN	
COOK		CHICAGO	
D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)	
IL	60623	031	

VIII. OPERATOR INFORMATION

X. EXISTING ENVIRONMENTAL PERMITS

XI. MAP

Fq: $A/50$

XII. NATURE OF BUSINESS (provide a brief description)

Generation and Distribution of Electrical Power

$$\frac{F_9 : A}{51}$$

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

COMMENTS FOR OFFICIAL USE ONLY

EPA Form 3510-1 (6-80)

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER														
			S F 1 2 0 0 4 4 2 3 1 4 7 0 T/A C 13 14 15														

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)	<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)
71	71
C 8	C 8
YR. 5 8	YR. 73 74
MO. 0 5	MO. 75 76
DAY 2 3	DAY 77 78
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)	

B. REVISED APPLICATION (place an "X" below and complete Item I above)

<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS	<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT
72	72

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C	DUP	T/A C 3 1					
1 2	13 14 15	29 - 32					
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
	1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)			1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G	5			
X-2	T 0 3	20	E	6			
1	T 0 4	288,000 000	U	7			
2				8			
3				9			
4				10			
16 - 18 19	27	28	29 - 32	16 - 18 19	27	28	29 - 32

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

To maintain thermal efficiency and mechanical integrity, it is necessary to periodically chemically clean the internal surfaces of large utility boilers. The frequency varies with boiler type but generally each boiler requires cleaning once every two to three years. The cleaning process involves several hours contact with the cleaning agent at elevated temperatures. The agent most generally used in this company is ammoniated ethylenediaminetetraacetic acid (EDTA). The spent cleaning solvent sometimes contains levels of chromium and lead, making it a hazardous waste. Thermal treatment is the most economical and environmentally acceptable method of treating this waste. The process involves pumping the spent EDTA solution directly from the cleaned boiler and spraying it into the furnace of another boiler. The spent solution typically contains from ten to twenty percent EDTA by weight. The major metals present are iron and copper, usually in concentrations less than one percent by weight. There are smaller amounts of calcium, magnesium, zinc, chromium and lead. The total volume is equal to one boiler volume. The boilers at this facility are cleaned approximately once every five years. The total amount of agent used is about 75,000 gals or an average of 15,000 gal (62.5 tons) per year.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										
							1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))						
X-1	K	0	5	4	900	P	T	0	3	D	8	0					
X-2	D	0	0	2	400	P	T	0	3	D	8	0					
X-3	D	0	0	1	100	P	T	0	3	D	8	0					
X-4	D	0	0	2													included with above

545

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	1	L	0	0	4	4	2	3	1	4	7	0	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: 1/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6: 8/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

41 49 42.0

087 43 21.0

VIII. FACILITY OWNER
☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

COMMONWEALTH EDISON COMPANY

312-294-4433

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

P.O. BOX 767, ROOM 1700E

CHICAGO

IL

60690

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

James W. Johnson
Vice President


11/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED



Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

543

November 18, 1980

CERTIFIED MAIL

U.S. Environmental Protection
Agency, Region V
RCRA Activities
Post Office Box 7861
Chicago, Illinois 60680

Subject: Application for Hazardous Waste
Permit - Crawford Station

Dear Sirs:

Commonwealth Edison Company hereby submits Forms 1 and 3 of EPA's Consolidated Permit Application - Part A for Crawford Station as required by Section 3005 of the Resource Conservation and Recovery Act.

Please amend Section IX of our notification of hazardous waste activity submitted on August 15, 1980 to include D000 (Toxic).

If there are any questions concerning the information provided, please contact me at 312/294-4433.

Sincerely,

Thomas E. Hemminger
Director of Water Quality

MEW:TEH:ds
Enclosures

Facility Name CRAWFORD GENER NO STNReviewer IA

INTERNAL CHECKLIST

Date Review Started 2-14

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING

☐

(2) FORM 3 MISSING

☐

B. POSTMARK after NOVEMBER 19, 1980

☐

Valid

☐

C. (1) DATE of OPERATION MISSING

☐

(2) DATE of OPERATION after NOVEMBER 19, 1980

☐

D. (1) NOTIFIED after AUGUST 18, 1980

☐

Valid

☐

(2) NONNOTIFIER

☐

E. (1) FORM 1, XIII B SIGNATURE MISSING

☐

(2) FORM 3, IX B SIGNATURE MISSING

☐2. A. TSDF☐

B. NONREGULATED

☐

C. UNSURE

☒

D. UNKNOWN FACILITY

☐

(missing name and address on Form 3)

E. NEW FACILITY

☐

F. CORE ITEM(S) MISSING

☐

G. NONCORE ITEM(S) MISSING

☐

H. OTHER

☐

RECORD OF
COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO:

FROM:

DATE

TIME

SUBJECT

Facility I.D.#/ Facility Name

SUMMARY OF COMMUNICATION

8/19 - James Engberg
waste is put into other boiler & burned.
he'll talk to people who filled out application and call back.

8/19 Mike Walker (294-4456)

- thermal treatment
- debrich's letter

Call - 4458 Angela Libby

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES

TO:

FORM 1 (EPA FORM 3510-1)

ITEM NUMBER

CHECK IF ITEM
MISSING

II. Pollutant Characteristics

☐

*III. Name of Facility

☐

IV. Facility Contact

☐

V. Facility Mailing Address

A. Street or P.O. Box

☐

B. City or Town

☐

C. State

☐

D. Zip Code

☐

VI. Facility Location

*A. Street, Route Number

☐

B. County Name

☐

*C. City or Town

☐

*D. State

☐

E. Zip Code

☐

F. County Code (if known)

☐

VII. SIC Codes (other than Process and Hazardous Waste codes)

☐

VIII. Operator Information

*A. Name

☐

*B. Is the name listed in VIII-A also the owner

☒

C. Status of operator

☐

D. Phone

☐

*E. Street or P.O. Box

☐

*F. City or Town

☐

*G. State

☐

H. Zip Code

☐

I.D.# _____

Reviewer's Initial _____

IX. Indian Land ☐X. Existing Environmental Permits ☐XI. Map ☐XII. Nature of Business ☐

XIII. Certification

A. *1. Name ☐2. Official Title ☐*B. Signature ☐*C. Date Signed ☐

Comments:

*Form 1 is missing ☐

FORM 3 (EPA FORM 3510-3)

ITEM NUMBER

CHECK IF ITEM
MISSING

II. First Application

*1. Existing Facility Date (on or before
November 19, 1980)

☐

OR

*2. New Facility Date (after November 19, 1980)

☐

III. Processes

*A. Process Code

☐

*B. Process Design Capacity-Amount

*1. Amount

☐

*2. Unit of Measure

☐

IV. Description of Hazardous Wastes

*A. EPA Hazardous Waste Number

☐

*B. Estimated Annual Quantity

☐

*C. Unit of Measure

☐

*D. Processes

*1. Process Codes

☐

*2. Process Description (If no code is shown)

☐

V. Facility Drawing

☐

VI. Photographs

☐

VII. Facility Geographic Location Latitude

Latitude

☐

Longitude

☐

I.D.# _____

Reviewer's Initial _____

CHECK IF ITEM
MISSING

VIII. Facility Owner

- *1. Name of Facility's Legal Owner
- 2. Phone
- *3. Street or P.O. Box
- *4. City or Town
- *5. State
- 6. Zip Code

IX. Owner Certification

- *A. Name
- *B. Signature
- *C. Date Signed

X. Operator Certification

- *A. Name
- *B. Signature
- *C. Date

Comments:

*Form 3 is missing

--

I.D.# _____

Reviewer's Initial _____

IL-0044231-70

PHASE ONE

Crawford Generating Station

543

Refer to
Form 1

Interim Regulatory Requirements

Indicate by
your initials:
Yes NoVerify
Date

1 2 3 T/S/D Facility? (If No, return to respondent.)

DB

Form 2 received?

DB

Form 3 received?

DB

1 2 3 Postmarked on or before November 19, 1980?

DB

3 Date of operation entered?

DB

3 Date of operation on or before November 19, 1980?

DB

Notified?

DB

Notified on or before August 18, 1980?

DB

1 Form 1, XIII B signed?

DB

3 Form 3, IX B signed?

DB

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: 1-29-81 }

PHASE TWO

1 2 3 Unsure if regulated or non-regulated?

3 New facility?

1 2 3 Core items missing? If Yes, indicate which items:

Facility name____; location____; mail address____; operator info____;

certification____; process info____; waste info____; owner____; sigs____.

PHASE THREE

1 2 3 Non-core items missing? If Yes, indicate which items:

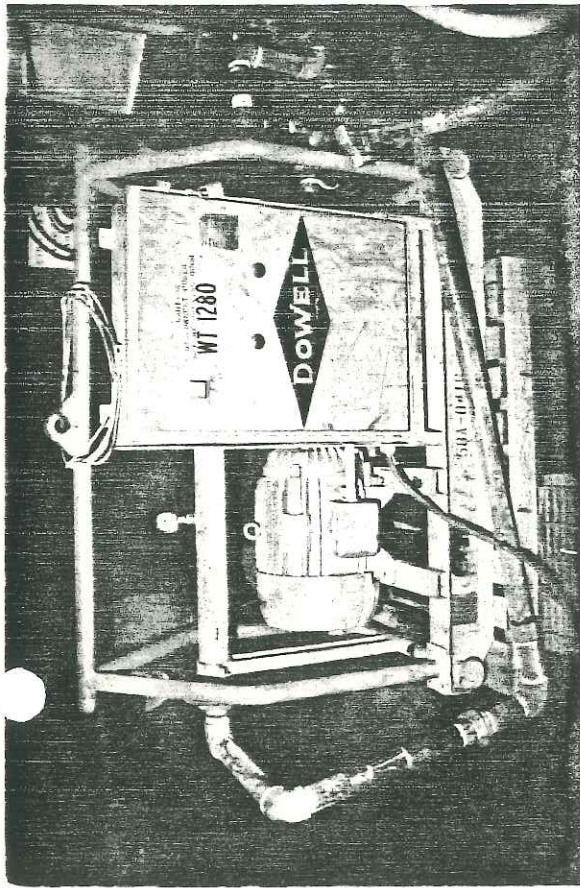
Maps____; photos____; drawings____; lat/long____.

Other observations and comments:

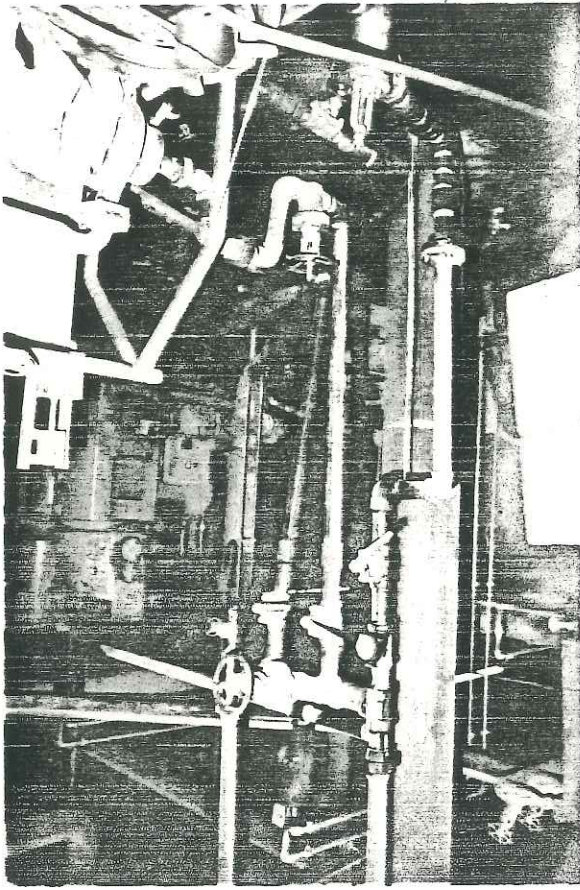
Received Date Stamp

(Stamp forms also)

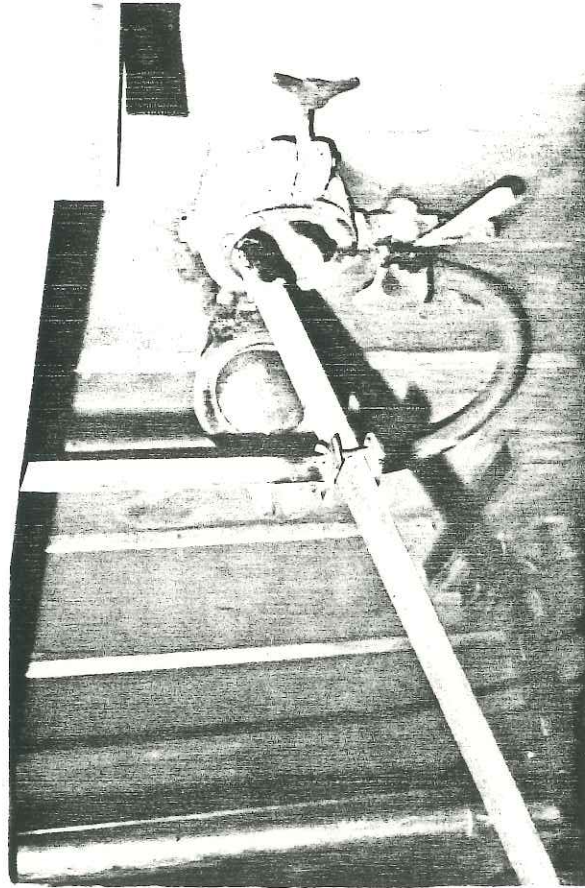
Log out Log in
on reverse side.



BOILER CLEANING EQUIPMENT
10/27/80



BOILER CLEANING EQUIPMENT
10/27/80



INJECTION POINT
10/27/80



INJECTION POINT
10/27/80

543

Crawford Generating Station
NPDES Permit No: IL 0002186

Discharges: 001 - Condenser Cooling Water & House Service Water
 001(a) - Demineralizer Regenerant Wastewater
 001(b) - Unit 7 Boiler Blowdown
 001(c) - Unit 8 Boiler Blowdown
 002 - Recirculating Combined Wastewater Treatment
 System Blowdown

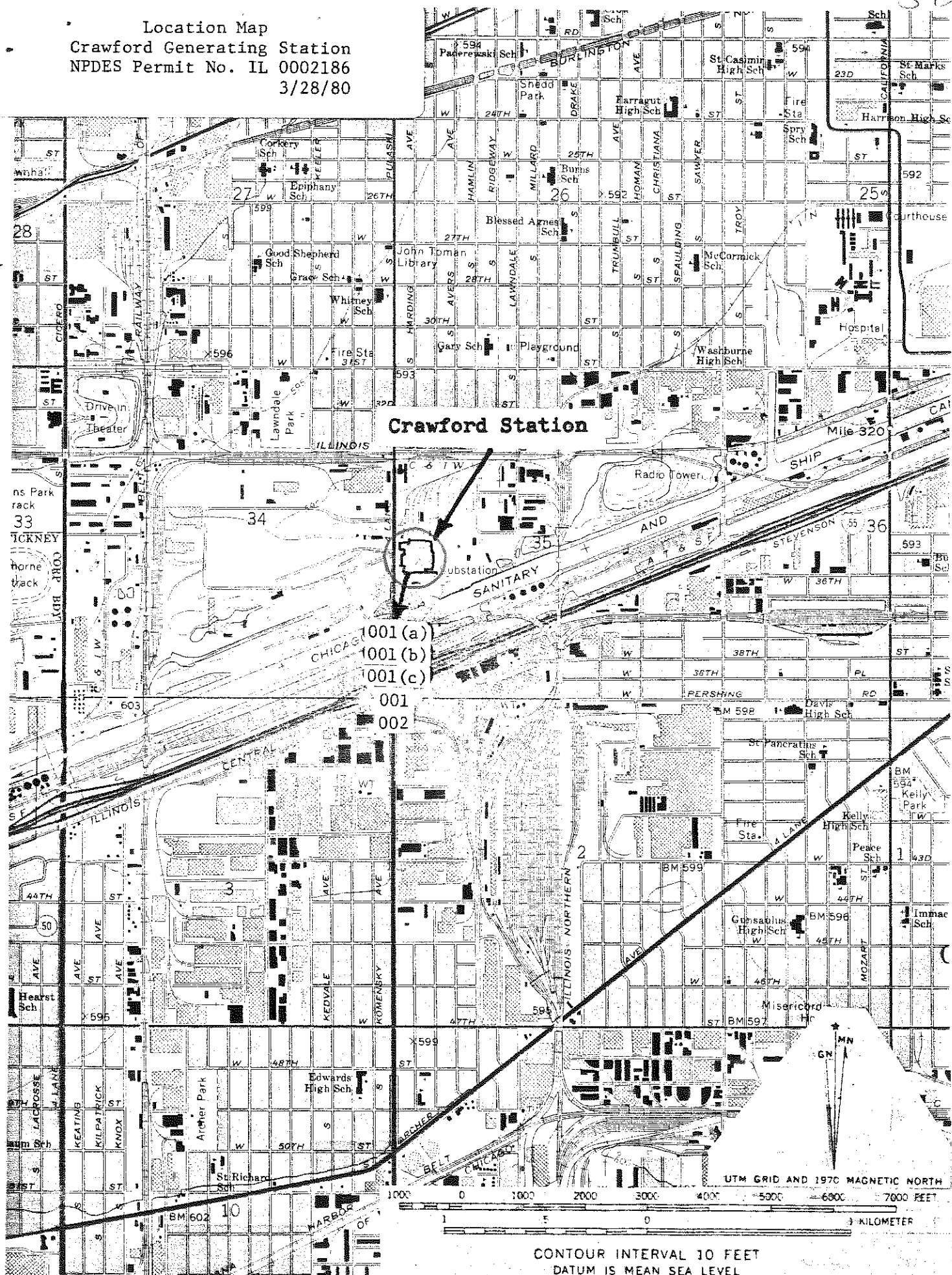
Location: Latitude 41° 49' 35" North
 Longitude 87° 43' 24" West
 SW 1/4 of Section 35
 Township 39N
 Range 13 East of 3rd Principal Meridian
 Cook County, City of Chicago

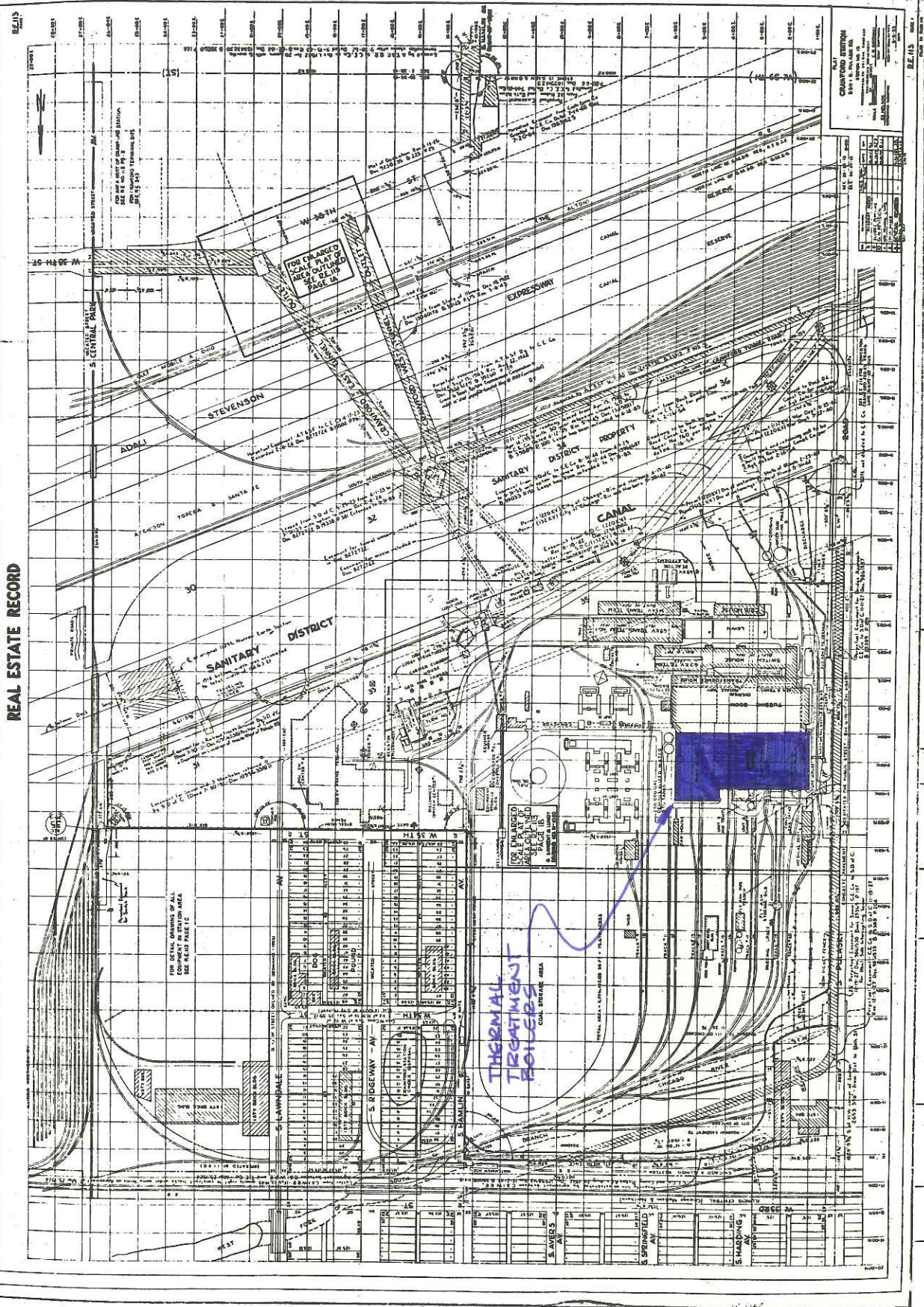
Receiving Stream: Chicago Sanitary and Ship Canal

Map: USGS Topographic Map, 7.5 minute series
 of Englewood, Illinois

3/28/80

Location Map
Crawford Generating Station
NPDES Permit No. IL 0002186
3/28/80







Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

D 044 231 470

September 16, 1982

Robert L. Stone
U.S. Environmental Protection Agency
Waste Management Branch
230 South Dearborn Street
Chicago, Illinois 60604

Subject: Crawford Station

Dear Mr. Stone:

Attached is the analysis of the river sediment which will be dredged at Crawford Stations intake bay.

If you have any questions, please call me on 294-4456.

Sincerely,

Michael Walker
Michael Walker
General Chemical Engineer

0478E
MEW:pp

*See U.S. EPA Region V letter of Sept. 9, 1982 and
my memo of Sept 23, 1982.*

R. L. Stone
9-23-82

RECEIVED

SEP 17 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

SOLID WASTE ANALYSIS
INTAKE BAY
CRAWFORD STATION

<u>METAL</u>	<u>E.P. TOXICITY (mg/l)</u>
Arsenic, As	0.007
Barium, Ba	1
Cadmium, Cd	0.07
Chromium, Cr	< 0.1
Copper, Cu	< 0.02
Lead, Pb	0.2
Mercury, Hg	< 0.0002
Nickel, Ni	1.37
Selenium, Se	< 0.002
Silver, Ag	< 0.02
Zinc, Zn	14.6
<u>Parameter</u>	<u>Results</u>
PCB's (ug/g)(Dried Sample)	6.4

Date: September 23, 1982
Subject: Commonwealth Edison Crawford Generating Station,
ILD 044 231 470
From: R. L. Stone, Illinois SIO
To: Part A file for subject facility

On the basis of the waste analysis results provided by Commonwealth Edison on September 16, 1982, the sludge from the Crawford Station intake bay is not subject to RCRA Subtitle C regulations.

No further U.S. EPA action is necessary.

R. L. Stone

March 26, 1984

Re: ILD 044 23/ 470
Commonwealth Edison

From: R. J. Stone

To: Part A file for above.

I have reviewed the Part A
for this location. It clearly
documents that the activities
described are either exempt
or non-regulated at this time.

Recommendation: Put into non regulated
file

RECORD OF COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

BOB STONE

FROM:

LISA PIERARD (RAIU)
~~DANIELA ALVAREZ~~

DATE

3-30-84

TIME

SUBJECT

Part A Withdraw

SENT TO IEPA 3-30-84

Barb called 4-11-84 with response

SUMMARY OF COMMUNICATION

Below are listed facilities in your state that are about to receive "final withdrawal" letters. If any of these facilities should not receive this letter please let me know by close of business 4-19-84.

ILD 046 583 993
ROCKFORD

SUNDSTRAND AVIATION OPERATIONS
(STORE < 90 DAYS) G + storer
Fed. Insp. 12-18-80

✓ ILD 025 022 997
CHICAGO
G + TRT 10-20-82

ACME BARREL COMPANY
(DRUM RECYCLING)

✓ ILD 044 231 470
CHICAGO
OK

COMMONWEALTH EDISON - CRAWFORD GEN. ST
(EXEMPTED WASTES)

ILD 006 304 109
OLNEY

ROADMASTER CORP (FORMERLY AMFWHEEL
GOODS DIV)
(WASTEWATER TREATMENT AND
STORAGE LESS THAN 90 DAYS)

8-18-81 TSD
Needs closure
Barb will call back

✓ ILD 005 464 896
WAUKEGAN
OK

DU-TONE CORP
(RECYCLING)

✓ ILD 005 137 914
CHICAGO G

RELIABLE PLATING CORP
(WASTE WATER TREATMENT)

CONCLUSIONS, ACTION TAKEN OR REQUIRED

✓ ILD 085 343 887
BLUE ISLAND OK

ONYX CHEMICAL CO
(PROTECTIVE FILER)

✓ ILD 025 163 726
CHICAGO OK

PHILIP A. HUNT CHEMICAL CORP.
(TRANSFER FACILITY)

INFORMATION COPIES

TO:



Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

December 22, 1981

RCRA Activities
Region V
P.O. Box A3587
Chicago, Illinois 60690

Subject: Notification of Unnecessary
Permit Application
Crawford Generating Station
EPA Facility I.D. #ILD044231470

OK 9 TBD PA
MGP 1-4-82

To Whom it May Concern:

This letter is to inform you that Crawford Generating Station has filed an unnecessary Hazardous Waste Permit Application, Part A of EPA's Consolidated Permit Application. The Company is informing the EPA that a permit application for this facility has been unnecessarily filed in order to eliminate unneeded inspections of facilities which are not subject to the regulations. We are taking this action with the clear understanding that, should the RCRA regulations be modified such that these or other of Commonwealth Edison's facilities are considered to be treatment, storage or disposal facilities prior to the termination of the interim status period, interim status will be available to these facilities in accordance with 40 CFR Section 122.22(a).

This station thermally treats boiler cleaning waste by injecting the waste into the fire side of the boiler along with the coal. Since this process results in the waste being co-treated with flyash and bottom ash, this process is exempt under 40 CFR Section 261.4 according to the letter of January 13, 1981 from Gary N Dietrich, Associate Deputy Assistant Administrator for Solid Waste to Paul Emler, Jr., Chairman of the Utility Solid Waste Activities Group.

RECEIVED

DEC 23 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

RECEIVED
12/29/81

Because this process is exempt, Crawford Generating Station is not a hazardous waste treatment facility; Commonwealth Edison wishes to withdraw its hazardous waste permit application. Should you have any questions, Angela Jankousky will be pleased to answer them at 312/294-4458.

Sincerely,

A handwritten signature in dark ink, appearing to read "JW Johnson", with a stylized, flowing script.

James W. Johnson
Vice President

1643a
ALJ:JWJ:ds

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

orig to PA
copy to notif

DATE: 1/04/82

5WMB

RE: Installation Name Commonwealth Edison Co. Crawford Generating Station

Installation Address 72 W. Adams St. - Chicago, IL

EPA ID# TID 044 231 470 9 TSD PA

FROM: Regulatory Analysis and Information Section

TO: Gene Meyer, Chief
Technical Programs Section

Attached for your review is a copy of Letter requesting
withdrawal of Crawford Generating Station TSD
Permit Application

for the above-referenced facility.

Cover letter date 12/22/81

Rec'd in Region 12/29/81

Rec'd in RAIS 12/29/81

Action required Withdrawal of Part A permit application

Reviewer's summary: The policies stated in the USEPA
letter (which I have enclosed) clearly exclude
the company's waste from ^{regulation} ~~exclusion~~ at this time
G. Hruska 1/15/82

PLEASE RETURN THIS FORM ALONG WITH ALL RELATED MATERIAL TO
DENISE BAKER



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

APR 8 1982

James Engberg, Station Superintendent
Commonwealth Edison Company
Crawford Generating Station
3501 South Pulaski
Chicago, Illinois 60623

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

RE: Interim Status Acknowledgement USEPA ID No. ILD044231470
FACILITY NAME: Commonwealth Edison Company
Crawford Generating Station

Dear Mr. Engberg:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

GRH 4/8/82

Enclosure

cc: James W. Johnson, Vice President

ILD 044 231 470

W/PTA

SHW-TUB

SEP 9 1982

Mr. Micheal Walker
Commonwealth Edison
P.O. Box 767
Chicago, Illinois 60690

Dear Mr. Walker:

This is to confirm our recent phone conversation in which you described additional sampling and analysis of the sludge which will be removed from the intake bay at the Crawford Generating Station. If you will provide us with a copy of the analytic results showing the sludge is other than hazardous waste, I will close our file on this matter. Of course you may still be subject to other Federal and State regulations pertaining to the dredging and disposal of dredged material.

Thank you for your cooperation on this matter.

Sincerely,

Robert L. Stone
State Implementation Officer
Waste Management Branch

R.Stone:rita:SHW-TUB:6-7444:9/8/82



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 13 1981

OFFICE OF WATER
AND WASTE MANAGEMENT

Mr. Paul Emler, Jr.
Chairman
Utility Solid Waste Activities
Group
Suite 700
1111 Nineteenth Street, N.W.
Washington, D.C. 20036

Dear Mr. Emler:

This is a response to your letter of October 10, 1980 to Administrator Costle, regarding the recent Solid Waste Disposal Act Amendments of 1980 and their relation to the electric utility industry. In your letter and its accompanying document, you discussed the specific amendments which address fossil fuel combustion wastes, and suggested interpretive language which EPA should adopt in carrying out the mandate of the amendments. You requested a meeting with our staff to make us more fully aware of the solid waste management practices of the electric utility industry, and to discuss the effect of the amendments on the utility solid waste study which EPA is currently conducting.

I appreciated the opportunity to meet with you, in your capacity as chairman of the Utility Solid Waste Activities Group (USWAG), on November 21 to discuss your concerns. I am taking this occasion to share with you the most recent EPA thinking on the exclusion from our hazardous waste management regulations of waste generated by the combustion of fossil fuels, and to confirm certain agreements which were reached during our meeting. The language contained in this letter should provide you and your constituents with an adequate interpretation of the fossil fuel combustion waste exclusion in Section 261.4(b)(4) of our regulations. This letter is also being circulated to appropriate Agency personnel, such as our Regional Directors of Enforcement, for their information and use. We intend to issue in the Federal Register an official Regulations Interpretation Memorandum reflecting the policies articulated in this letter.

In our May 19, 1980 hazardous waste management regulations, we published an exclusion from Subtitle C regulation for those fossil fuel combustion wastes which were the subject of then pending Congressional amendments. The language of that exclusion in §261.4(b)(4) of our May 19 regulations is identical to pertinent language of Section 7 of the Solid Waste Disposal Act

Amendments of 1980 (P.L. 96-482) which was enacted on October 21, 1980 and which mandates that exclusion. Specifically, the exclusion language of our regulations provides that the following solid wastes are not hazardous wastes:

"Fly ash waste, bottom ash waste, slag waste, and flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels."

Residues from the Combustion of Fuel Mixtures

The first point which you raise in your letter and your "Proposed RIM Language" is the interpretation of the term "primarily" used in this exclusion language. EPA believes that Congress intended the term "primarily" to mean that the fossil fuel is the predominant fuel in the fuel mix, i.e., more than 50 percent of the fuel mix. (See Congressional Record, February 20, 1980, p. H1103, remarks of Congressman Horton and p. H1102, remarks of Congressman Beville.) Therefore, EPA is interpreting the exclusion of §261.4(b)(4) to include fly ash, bottom ash, boiler slag and flue gas emission control wastes (hereinafter referred to as "combustion wastes") that are generated by the combustion of mixtures of fossil fuels and alternative fuels, provided that fossil fuels make up at least 50 percent of the fuel mix.

This interpretation begs the question of whether the exclusion also extends to combustion wastes that result from the burning of mixtures of fossil fuels and hazardous wastes. We have limited data which indicates that spent solvents listed in §261.31 of our regulations, certain distillation residues listed in §261.32, waste oils that may be hazardous wastes by virtue of characteristics or the mixture rule, and other hazardous wastes are often burned as supplemental fuels--sometimes in proportionally small amounts but sometimes in significant amounts (comprising 10 percent or more of the fuel mix ratio)--particularly in industrial boilers but sometimes in utility boilers. EPA is concerned about the human health and environmental effect of the burning of these hazardous wastes: both the effect of emissions into the atmosphere and the effect of combustion residuals that would be contained in the fly ash, bottom ash, boiler slag and flue gas emission control wastes.

We intend to address the first of these concerns in our future development of special requirements applicable to hazardous wastes that are beneficially used or legitimately recycled. In §261.6 of our May 19, 1980 regulations, we currently exempt from regulatory coverage hazardous wastes that are beneficially used or legitimately recycled, except that, where these wastes are listed as hazardous wastes or sludges, their storage or transportation prior to use or recycle is subject to our

regulations. We clearly explained in the preamble to Part 261 of our May 19 regulations that we fully intend to eventually regulate the use and recycling of hazardous wastes and, in doing so, would probably, in most cases, develop special requirements that provide adequate protection of human health and the environment without unwarranted discouragement of resource conservation. Consequently, although the burning of hazardous waste as a fuel (a beneficial use assuming that the waste has a positive fuel value) is not now subject to our regulations (except as noted above) it may well be subject to our regulation in the future.

Our second concern with combustion of fuel mixtures is the one at focus in this interpretation. It must first be noted that we do not intend for §261.6 to provide an exemption from regulation for combustion wastes resulting from the burning of hazardous wastes in combination with fossil fuels; it only provides an exemption for the actual burning of hazardous wastes for recovery of fuel value. Thus, if these combustion wastes are exempted from our regulation, such exemption must be found through interpretation of §261.4(b)(4). Secondly, we note that although the pertinent language in Section 7 of the Solid Waste Disposal Act Amendments of 1980 and the related legislative history on this matter speak of allowing the burning of alternative fuel without precisely defining or delineating the types of alternative fuel, the only examples of alternative fuels used in the legislative history are refuse derived fuels. Therefore, a literal reading of the legislative history might enable us to interpret the exclusion to include combustion wastes resulting from the burning of fossil fuels and other fuels, including hazardous wastes. However, since each of these legislative comments was made in the context of refuse derived fuels or other non-hazardous alternate fuels, we do not believe the Congressional intent compels us to make such an interpretation if we have reason to believe that such combustion wastes are hazardous.

Presently, we have little data on whether or to what extent combustion wastes are "contaminated" by the burning of fossil fuel/hazardous waste mixtures. The data we do have (e.g., burning of waste oils) suggests that the hazardous waste could contribute toxic heavy metal contaminants to such combustion wastes. When coal is the primary fuel, the amount of resulting contamination is probably in amounts that are not significantly different than the metals that would be contributed by the fossil fuel component of the fuel mixture. This may not be the case with oil and gas, where huge volumes of waste are not available to provide a dilution effect. We suspect that the other hazardous constituents of the hazardous wastes that typically would be burned as a fuel are either thermally destroyed or are emitted in the flue gas (and therefore are part of our first concern as discussed above). If

these data and this presumption are true, then combustion wastes resulting from the burning of coal/hazardous waste mixtures should not be significantly different in composition than combustion wastes generated by the burning of coal alone. Because the Congress has seen fit to exclude the latter wastes from Subtitle C, pending more study, we feel compelled to provide the same exclusion to the former wastes.

Accordingly, we will interpret the exclusion of §261.4(b)(4) to include fly ash, bottom ash, boiler slag and flue gas emission control wastes generated in the combustion of coal/hazardous waste mixtures provided that coal makes up more than 50 percent of the fuel mixture.

We offer this interpretation with great reluctance and with the clear understanding it is subject to change, if and when data indicate that combustion wastes are significantly contaminated by the burning of hazardous wastes as fuel. We also offer this interpretation with the understanding, as discussed at our meeting of November 21, that the utility industry will work with us over the next several months to improve our data on this matter. We believe it is essential that we make a more informed judgement and possible reconsideration of our interpretation of the exclusion as soon as possible and before completion of our longer-term study of utility waste which is proceeding. Accordingly, we would like you to provide to us all available data on the following questions by August 1, 1980.

1. What types of hazardous wastes are commonly burned as fuels in utility boilers? In what quantity? In what ratio to fossil fuels? How often? What is their BTU content?
2. Does the burning of these wastes contribute hazardous constituents (see Appendix VIII of Part 261 of our regulations) to any of the combustion wastes? If so, what constituents, and in what amounts? How does the composition of combustion wastes change when hazardous wastes are burned?

Co-disposal and Co-treatment

The second issue raised in your letter was whether the exclusion extends to wastes produced in conjunction with the burning of fossil fuels which are co-disposed or co-treated with fly ash, bottom ash, boiler slag and flue gas emission control wastes. As examples of such wastes, you specifically mention boiler cleaning solutions, boiler blowdown, demineralizer regenerant, pyrites, cooling tower blowdown, or any "wastes of power plant origin whose co-treatment with fly ash, bottom ash, slag and flue gas emission control sludges is regulated under State-or-EPA-sanctioned management or treatment plans.

The legislative history on this matter clearly indicates that the Congress intended that these other wastes be exempted from Subtitle C regulation provided that they are mixed with and co-disposed or co-treated with the combustion wastes and further provided that "there is no evidence of any substantial environmental danger from these mixtures." (See Congressional Record, February 20, 1980, p. H 1102, remarks of Congressman Beville; also see remarks of Congressman Rahall, Congressional Record, February 20, 1980, p. H1104.)

We have very little data on the composition, character and quantity of these other associated wastes (those cited above), but the data we do have suggest that they are generated in small quantities relative to combustion wastes, at least when coal is the fuel, and that they primarily contain the same heavy metal contaminants as the combustion wastes, although they may have a significantly different pH than the combustion wastes. These limited data therefore suggest that, when these other wastes are mixed with and co-disposed or co-treated with the much larger quantities of combustion wastes, their composition and character are "masked" by the composition and character of the combustion wastes; that is, they do not significantly alter the hazardous character, if any, of the combustion wastes.

Given this information base and given the absence of definitive information indicating that these other wastes do pose a "substantial danger" to human health or the environment, we believe it is appropriate, in the light of Congressional intent, to interpret the §261.4(b)(4) exclusion to include other wastes that are generated in conjunction with the burning of fossil fuels and mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag and flue gas emission control wastes.

We offer this interpretation with some reluctance because it is made in the absence of definitive information about the hazardous properties of these other wastes or their mixtures with combustion wastes. We therefore believe it is imperative that we proceed to collect all available data on this matter within the next several months and reconsider this interpretation when these data are assessed. Toward that end and consistent with the discussion at our meeting of November 21, we are asking that you assist us in collecting these data. Specifically, we ask that you collect and submit by August 1, 1981, any available data on the following questions:

1. What are the "other" wastes which are commonly mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag or flue gas emission control wastes? What are their physical (e.g., sludge or liquid) and chemical properties? Are they hazardous wastes in accordance with Part 261?

2. What are the co-disposal or co-treatment methods employed?
3. How often are these wastes generated? In what quantities are they generated? Are they commonly treated in any way before being co-disposed?
4. Does the industry possess any data on the environmental effects of co-disposing of these wastes? Groundwater monitoring data? What are the results?

The interpretation on other associated wastes provided in this letter is limited to wastes that are generated in conjunction with the burning of fossil fuels. We do not intend to exempt hazardous wastes that are generated by activities that are not directly associated with fossil fuel combustion, steam generation or water cooling processes. Thus, for example, the §261.4(b)(4) exclusion does not cover pesticides or herbicide wastes; spent solvents, waste oils or other wastes that might be generated in construction or maintenance activities typically carried out at utility and industrial plants; or any of the commercial chemicals listed in §261.33 which are discarded or intended to be discarded and therefore are hazardous wastes. Further, the exclusion does not cover any of the hazardous wastes listed in §§261.31 or 261.32 of our regulations. None of these listed wastes were mentioned in your letter or our discussions.

The interpretation on other wastes is also limited to wastes that traditionally have been and which actually are mixed with and co-disposed or co-treated with combustion wastes. If any of these other wastes (e.g., boiler cleaning solutions, boiler blowdown, demineralizer regenerant, pyrites and cooling tower blowdown) are segregated and disposed of or treated separately from combustion wastes and they are hazardous wastes, they are not covered by the exclusion. In the same vein, the exclusion does not cover other wastes where there are no combustion wastes (or relatively small amounts of combustion wastes) with which they might be mixed and co-disposed or co-treated--a situation which might prevail where natural gas or oil is the principal fossil fuel being used. Therefore, this interpretation of the exclusion applies only where coal is the primary fuel. We feel this is a legitimate interpretation of Congressional intent, wherein the argument of little potential environmental hazard, primarily due to the dilution factor, is clearly based upon co-disposal or co-treatment with the huge volumes of wastes generated during coal combustion.

EPA Utility Waste Study

The groups of questions raised above bring us to the final subject which you address concerning the study of utility solid waste management which EPA is conducting. We agree that the study, as currently being conducted, does not focus on the matters discussed in this letter. We would, however, like to address these matters and include them in our report to Congress, to the extent possible. To accomplish this, we plan to meet in the very near future with our contractor, Arthur D. Little, Inc., to discuss what studies may need to be carried out in addition to their currently planned activities under the contract. The inputs of your organization could be quite useful in this effort. It may be impossible, however, to modify our present study to include a detailed investigation of all of the issues discussed above.

Notwithstanding, we would like to address the matters discussed in this letter within a shorter time frame--during the next six months. Based on our meeting of November 21, it is my understanding that the utility industry, working closely with EPA, is willing to develop data on the questions put forth above. We agreed that, as a first step, USWAG will prepare a study outline designed to obtain these data. EPA staff and industry representatives designated by your organization will then mutually review the information needs. The data collection effort will then follow. Finally, data and analyses will be presented to EPA for review. This will enable us to reconsider the interpretation provided in this letter and make any changes deemed necessary. Therefore, I would appreciate it if you would designate a technical representative as USWAG's contact person for this coordinated data collection effort.

In the meantime, and pending completion of this effort, EPA will interpret 40 CFR §261.4(b)(4) to mean that the following solid wastes are not hazardous wastes:

- (a) Fly ash, bottom ash, boiler slag and flue gas emission control wastes resulting from (1) the combustion solely of coal, oil, or natural gas, (2) the combustion of any mixture of these fossil fuels, or (3) the combustion of any mixture of coal and other fuels, up to a 50 percent mixture of such other fuels.
- (b) Wastes produced in conjunction with the combustion of fossil fuels, which are necessarily associated with the production of energy, and which traditionally have been, and which actually are, mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag, or flue gas emission control wastes from coal combustion.

This provision includes, but is not limited to, the following wastes:

- (1) boiler cleaning solutions,
- (2) boiler blowdown,
- (3) demineralizer regenerant,
- (4) pyrites, and
- (5) cooling tower blowdown.

I am hopeful that our future research activities together will prove fruitful and that these issues can be rapidly resolved. I have designated Ms. Penelope Hansen of my staff as the EPA point of contact for this effort. You may reach her at (202) 753-9206.

Sincerely yours,



Gary N. Dietrich
Associate Deputy Assistant Administrator
for Solid Waste

THE COMPANIES LIST

ILD 046583993
Rockford

Sundstrand Aviation Operations
(Store <90 days)

ILD 025022997
Chicago

Acme Barrel Company
(Drum Recycling)

ILD 044231470
Chicago

Commonwealth Edison-Crawford Gen. Stat.
(Exempted Wastes)

ILD 006304109
Olney

Roadmaster Corp. (Formerly AMF Wheel Goods Div.)
(Wastewater treatment and storage less
than 90 days)

ILD 005464896
Waukegan

Du-Tone Corp.
(Recycling)

ILD 005137914
Chicago

Reliable Plating Corp
(Waste Water Treatment)

ILD 035343887
Blue Island

Onyx Chemical Co.
(Protective Filer)

ILD 025163726
Chicago

Philip A. Hunt Chemical Corp.
(Transfer Facility)



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF
5HW-13

MAY 29 1984

James W. Johnson, Vice President
Commonwealth Edison Company
P. O. Box 767
Chicago, Illinois 60690

RE: Withdrawal of Part A (Exempted Waste)
FACILITY NAME: Crawford Generating Station
USEPA ID NO.: ILD044231470

Dear Mr. Johnson:

This is to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of December 22, 1981, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility only treats, stores or disposes of waste listed in 40 CFR Part 261.4 (enclosed), which are exempt from regulations at this time.

It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you still must comply with all applicable State and local requirements.

You will retain your U.S. EPA identification number if you notified as a generator or transporter of hazardous waste.

Please contact the Regulatory Analysis and Information Unit at (312) 886-6148 for assistance, if you have any questions. Please refer to "Withdrawal of Part A (Exempted Wastes)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Michael Walker, General Chemical Engineer
James Engberg, Station Superintendent
IEPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

DEC 27 2011

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL 7009 1680 0000 7672 2681
RETURN RECEIPT REQUESTED

Mr. Michael Hanrahan
Managing Director
Fisk and Crawford Stations
Midwest Generation LLC
Crawford Generating Station
3501 South Pulaski Road
Chicago, Illinois 60623-4987

Re: Notice of Violation
Midwest Generation LLC
Crawford Generating Station
EPA ID. No.: ILD 044 2310470

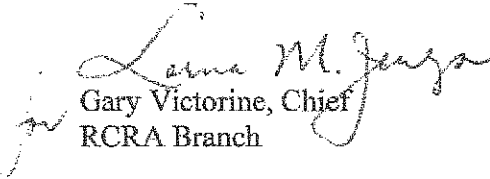
Dear Mr. Hanrahan:

On August 8, 2011 a representative of the U.S. Environmental Protection Agency inspected Midwest Generation LLC's Crawford Generating Station (Midwest Generation) located in Chicago, Illinois. In response to violations of Title 35 of the Illinois Administrative Code and the United States Code of Federal Regulations identified during the inspection, EPA issued a Notice of Violation to Midwest Generation on November 3, 2011. Midwest Generation submitted additional information regarding the identified violations on or about November 14, 2011 and December 5, 2011.

This letter is to inform you that EPA has reviewed the referenced information and response and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Illinois Environmental Protection Agency will continue to evaluate Midwest Generation in the future.

If you have any questions and/or concerns regarding this matter, please contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,


Gary Victorine, Chief
RCRA Branch

cc: Todd.Marvel@illinois.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 27 2011

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL 7009 1680 0000 7672-2681-2711

RETURN RECEIPT REQUESTED

*11/27/12 DONG
via Donald Isaac's*

Mr. Michael Hanrahan
Managing Director
Fisk and Crawford Stations
Midwest Generation LLC
Crawford Generating Station
3501 South Pulaski Road
Chicago, Illinois 60623-4987

Re: Notice of Violation
Midwest Generation LLC
Crawford Generating Station
EPA ID. No.: ILD 044 231 0470

Dear Mr. Hanrahan:

On August 8, 2011 a representative of the U.S. Environmental Protection Agency inspected Midwest Generation LLC's Crawford Generation Station (Midwest Generation) located in Chicago, Illinois. In response to violations of Title 35 of the Illinois Administrative Code and the United States Code of Federal Regulations identified during the inspection, EPA issued a Notice of Violation to Midwest Generation on November 3, 2011. Midwest Generation submitted additional information regarding the identified violations on or about November 14, 2011 and December 5, 2011.

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If you have any questions and/or concerns regarding this matter, please contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,

Lama M. Janga
Gary Victorine, Chief
RCRA Branch

cc: Todd.Marvel@illinois.gov

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<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front if space permits.		<p>A. Received by (Please Print Clearly) _____</p> <p>B. Date of Delivery <u>4/6/03</u></p> <p>C. Signature <u>X</u> <i>Donald Isaac</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Agent If YES, enter delivery address below: <input type="checkbox"/> Addressee <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
1. Article Addressed to: <u>Donald Isaac</u> <u>Environmental Specialist</u> <u>Midwest Generation UC</u> <u>3501 S. Pulaski Rd.</u> <u>Chicago, IL 60623</u> <u>(498)</u>		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (Transfer from service label) PS Form 3811, March 2001		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
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Region 5
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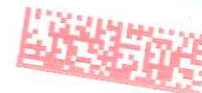
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Mr. Michael Hanrahan
Managing Director
Midwest Generation LLC
3501 South Pulaski Road
Chicago, IL 60623-4987

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1. Article Addressed to:

Mr. Michael Hanrahan
Managing Director
Midwest Generation LLC
3501 South Pulaski Road
Chicago, IL 60623-4987

2. Article Number
(Transfer from service label)

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- ☐ No



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 03 2011

REPLY TO THE ATTENTION OF:
LR-8J

CERTIFIED MAIL 7009 1680 0000 4296
RETURN RECEIPT REQUESTED

Mr. Donald A. Isaacs
Environmental Specialist
Midwest Generation LLC
Crawford Generating Station
3501 South Pulaski Road
Chicago, Illinois 60623-4987

Re: Notice of Violation
Midwest Generation LLC
Crawford Generating Station
EPA ID. NO.: ILD 044 231 470

Dear Mr. Isaacs:

On August 8, 2011 a representative of the U. S. Environmental Protection Agency inspected Midwest Generation LLC's Crawford Generating Station (Midwest Generation or the facility) located in Chicago, Illinois. The purpose of the inspection was to evaluate Midwest Generation's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste and used oil. Please find enclosed a copy of the inspection report for your reference.

Based on the EPA's August 8, 2011 inspection that included personal observations made by the inspector, and a subsequent review of records and information provided by Midwest Generation personnel, EPA finds that Midwest Generation is in violation of the requirements of Title 35 of the Illinois Administrative Code (35 IAC), Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939(e), and Title 40 of the United States Code of Federal Regulations (40 CFR), Parts 260-279. Specifically, we find that Midwest Generation is in noncompliance with the following requirements:

1. Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See 35 IAC § 739.122 (c)(1) [40 CFR § 279.22(c)(1)]. At the time of the inspection, Midwest Generation had not labeled or marked

clearly two aboveground tanks, four 55-gallon containers, and two secondary containment units with the words "Used Oil." Midwest Generation, therefore, violated the used oil regulations.

2. Upon detection of a release of used oil, a generator must stop the release, contain the release, clean up and manage the release, and repair and replace any leaking used oil storage containers or tanks, if necessary, prior to returning them to service. See 35 IAC § 739.122(d)(1)-(4) [40 CFR § 279.22(d)(1)-(4)]. At the time of the inspection, Midwest Generation had not cleaned up the release of used oil to: 1) the floor of the east storage room including the floor sump or pit; 2) the container secondary containment in the east storage room; 3) on the top of a 55-gallon container; and 4) the yellow secondary containment box located along the exterior wall on the south side of the HAZMAT Building. In addition, the secondary containment was not free of used oil, closed or marked clearly with the words "Used Oil." Midwest Generation, therefore, violated the used oil regulations.

3. Containers and aboveground tanks used to store used oil at generator facilities must be in good condition. See 35 IAC § 739.122(b)(1) [40 CFR § 279.22(b)(1)]. At the time of the inspection, Midwest Generation was using containers to store used oil that were not in good condition. Midwest Generation therefore violated the used oil regulations.

4. Used oil generators shall not store used oil in units other than aboveground tanks, containers, or units subject to regulation under 35 IAC 724 and 725 [40 CFR Parts 264 or 265]. Generators of used oil shall not manage used oil in a surface impoundment unit unless the surface impoundment unit is subject to regulation under 35 IAC 724 and 725 [40 CFR Parts 264 or 265]. See 35 IAC § 739.122(a) [40 CFR § 279.22(a)]. At the time of the inspection, Midwest Generation was storing used oil in a floor sump or pit in the east storage room of the HAZMAT Building, and in two surface impoundments not subject to regulation under 35 IAC 724 and 725 [40 CFR Parts 264 or 265]. Midwest Generation therefore violated the used oil regulations.

Under Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

However, please be advised that Midwest Generation's compliance with the conditions and requirements described above will not relieve Midwest Generation of its liability for the violations identified in this letter. EPA reserves the right to bring further enforcement actions (including an action for civil penalties) against Midwest Generation for the violations identified in this letter.

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Mr. Michael Hanrahan Managing Director Midwest Generation LLC 3501 South Pulaski Road Chicago, IL 60623-4987	

You should submit your response to Diane Sharrow, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Sharrow, of my staff, at (312) 886-6199.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Little".

Paul Little, Acting Chief
RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd.Marvel@illinois.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Midwest Generation LLC (Crawford Generating Station)

U.S. EPA ID. No.: ILD044231470

NAICS CODE: 221112 (Fossil Fuel Electric Power Generation)

DATE OF INSPECTION: August 8, 2011

U.S. EPA INSPECTOR: Diane M. Sharrow

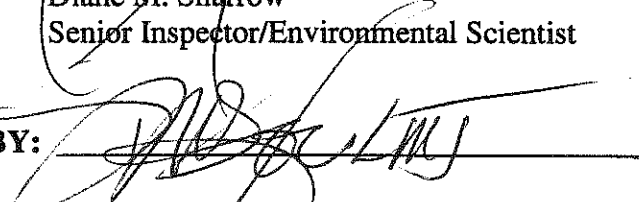
PREPARED BY:


Diane M. Sharrow
Senior Inspector/Environmental Scientist

10-14-11

Date

REVIEWED BY:


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch

10/28/11

Date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

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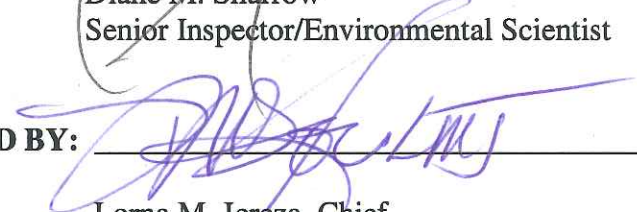
PREPARED BY:


Diane M. Sharrow
Senior Inspector/Environmental Scientist

10-14-11

Date

REVIEWED BY:


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch

10/28/11

Date

Purpose of Inspection

The purpose of the inspection was to conduct a compliance evaluation inspection (CEI) at Midwest Generation LLC's Crawford Generating Station (Midwest Generation) facility. The CEI was conducted to evaluate Midwest Generation's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste and used oil.

Background

A CEI to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste, was last conducted at Midwest Generation by the United States Environmental Protection Agency (U.S. EPA) on June 26, 2002. Midwest Generation's Crawford Generating Station is a fossil fuel electric power generator. Based on my review of information in the RCRA Information System (RCRIS), Midwest Generation is currently classified as a small quantity generator (SQG) of hazardous waste.

Opening Conference

I arrived at Midwest Generation at approximately 8:30 AM. I parked my vehicle and entered the security office where I presented my enforcement credentials to a female security guard (guard). I explained that the purpose of my visit was to conduct an unannounced CEI. The guard placed several telephone calls and then informed me that a representative of Midwest Generation would meet me at the Security Office in a few minutes. During this time the security staff screened my vehicle and asked for my Drivers License which they copied before granting me a visitor pass.

I waited in the parking lot (Photograph 1) where I was soon met by Donald Isaacs, an Environmental Specialist with Midwest Generation. I introduced myself to Mr. Isaacs, presented my enforcement credentials and explained that the purpose of my visit was to conduct an unannounced CEI at the facility, and to inspect the two impoundments or ponds that were located at the Facility. I showed Mr. Isaacs an aerial photograph that had been given to me by U.S. EPA Region 5's Office of Enforcement and Compliance Assurance (OECA). He indicated that he knew where the impoundments or ponds were located, though he referred to them as "Pit or Pit 9?" I also provided him with a copy of the aerial photograph.

I asked Mr. Isaacs about Midwest Generation's current hazardous waste generation status or classification. He explained that even though Midwest Generation is primarily a SQG, they maintain a RCRA Facility Plan (Contingency Plan), for periods when they must comply with the LQG requirements. Mr. Isaacs also explained that Midwest Generation's only hazardous waste storage area (HAZMAT Building) was located not too far from the security gate and that we could walk to the area. He explained further that Midwest Generation did not have any hazardous waste satellite accumulation areas.

I asked Mr. Isaacs if my safety equipment met Midwest Generation's requirements. He said it did except that I did not have a long-sleeve shirt or jacket, but that it would be okay since we would not be entering the generation plant or areas where long-sleeves were required. I also explained to Mr. Isaacs that I would be taking photographs, but would let him know when I wanted to take a photograph so he could also take a photograph. Mr. Isaacs made a brief cellular phone call, and then we entered the Facility security gate.

Visual Site Inspection

Mr. Isaacs and I approached the HAZMAT Building after a brief walk (Photograph 3). I did not note any containers on the west side of the HAZMAT Building. Mr. Isaacs opened the west door (our right as we faced the HAZMAT Building) and turned on the lights before we proceeded into the west storage room. Mr. Isaacs indicated that there was no hazardous waste currently in storage. I observed no hazardous waste in the west room and I also observed that the floor was clean and dry (Photograph 2). Mr. Isaacs stated that during the majority of the calendar year, Midwest Generation is a SQG, but occasionally their hazardous waste generation exceeds 1,000 kilograms in a given month and they become a large quantity generator (LQG) primarily due to the lab packing of small amounts of hazardous waste or due to a clean out or a cleanup (e.g., due to a July 2010 flood of the turbine basement). I did not notice any posting of emergency information in the west room as required of SQGs, but there was also no hazardous waste in storage and Midwest Generation maintains a RCRA Contingency Plan with emergency information that describes arrangements made with local authorities and copies of the RCRA Contingency Plan are sent to those authorities.

As we exited the west room, I asked Mr. Isaacs whether Midwest Generation generated any other types of waste such as universal waste or used oil. Mr. Isaacs indicated that Midwest Generation does occasionally generate universal waste and asbestos waste, but primarily they generate used oil which was stored in the east storage room (our left as we faced the HAZMAT Building) next to the west storage room (Photograph 3). Mr. Isaacs opened the east door and turned on the lights before we proceeded into the east storage room (Photographs 4 through 15).

Inside the east storage room I noted a secondary containment pallet (Photographs 4 and 5) that was marked with the words, "Portable Containment for storage of substances that are incompatible with other materials.", and the words, "DO NOT MOVE" (Photograph 4). I also noted dark staining and small pieces of debris on the floor and under the pallet. I observed oily material on the yellow grate on the top of the pallet and in the secondary containment itself (Photographs 4 and 5). I asked Mr. Isaacs what the material was and he stated that he thought it was used oil.

In the used oil storage area I also noted thirteen 55-gallon containers and two yellow used oil storage tanks or large totes. One of the containers had oil on top of the lid (Photograph 6), and the floor around this container and the entire room were stained with dried used oil and outlines of rust apparently from the bottom of the containers (Photographs 6 through 13), as well as small patches of liquid used oil (Photographs 11 and 12). I also noted that there was a grated sump

or pit in the southwest portion of the east storage room floor that contained a dark and oily liquid material (Photograph 14).

I noted that the yellow used oil tanks or large totes were labeled, "Lube Cube" and "Waste Oil" as well as "Used Oil Only" (Photographs 7 and 8). When I pointed out to Mr. Isaacs that the correct label should read "Used Oil", he promptly covered the labels on the yellow tanks that read "Waste Oil". I asked Mr. Isaacs if he knew which of the containers held used oil since I had found only that only two of the containers were labeled: one as "EMPTY" (Photographs 7 and 10), and one as "WASTE ANTIFREEZE" (Photograph 12). Mr. Isaacs indicated that some of the containers contained product, or were empty, but that the container on a dolly next to the yellow tanks (Photographs 7 through 9), probably contained used oil as well as three others that I found that were not empty. I noted that all 13 containers had condition issues. One container had a bowed bottom that prevented it from sitting flat on the floor (Photograph 7), one was dented and misshapen (Photographs 11 and 12), and all the containers had rust or corrosion of various degrees on the seams, lids, bungs and /or bottoms (Photographs 7 through 12).

As we exited the HAZMAT Building, I noted stained gravel and an open yellow secondary containment box (Photographs 15 and 16) on the east side of the HAZMAT Building. I observed used oil or an oily material in the bottom of the containment box. The containment box did not have a label identifying the waste or used oil material. I also walked around to the south side of the HAZMAT Building, but did not observe any waste or containers.

We then proceeded in a southeast to southerly direction to the impoundments or ponds (Photographs 17 through 31). I observed a manhole on the north to northwest edge of the impoundments (Photographs 17 and 18). I noted that the volume of liquid material in the impoundment actually connects the two impoundments located on the aerial photograph. I also noted that impoundments did not have a well defined or engineered edge in several places, but there was rock or cobble around the majority of the perimeter. I also noted that it appeared that storm water flows into the impoundments due to the presence of erosion channels (Photographs 18 through 21).

I asked Mr. Isaacs if the impoundments were engineered, in that I noted several metal and PVC pipes of approximately 3 to 4 feet sticking out of the gravel around the impoundments (Photographs 18, 19 and 20) and from the impoundments themselves (Photograph 21), as well as several engineered structures including a concrete "berm" or weir down the middle of the larger impoundment. He said that they were engineered to the extent that there was an oil-water separator near the "Pit 9" weir that sent material to a holding tank and then to the Wastewater Treatment Plant (Photographs 32 and 33). Mr. Isaacs indicated that Midwest Generation met the NPDES oil standards, but had asked for a variance from the oil standards under their discharge permit. I did not ask him if Midwest Generation had a Stormwater Pollution Prevention Plan (SWPPP).

As I walked around the perimeter of the impoundments, I also observed the following: 1) a number of used booms and booms in use that were stained with used oil (Photographs 28 through 30); rock or cobble, as well as soil that were stained with used oil (Photographs 17 through 30);

and oil sheen on the surface of the impoundments (Photographs 21 through 30). I did not note any insects or wildlife in or around the impoundments and noted very little vegetation around the impoundments. I did note a blue 55-gallon container with liquid material inside at the north edge of the impoundments. I asked Mr. Isaacs what the container held and whether it was used in the impoundments. He did not think so and did not know what the container held or what it was used for so he made a couple of cellular phone calls. As the result of the calls, he told me that the container did not belong at the impoundments, but contained a product used elsewhere at the Facility.

We then proceeded to the WWTP (Photographs 32 and 33). After touring the WWTP we walked to Mr. Isaacs office approximately 10 minutes walk from the impoundments.

During the CEI I took 33 photographs with a Nikon Cool pix digital camera, with 8.1 megapixel resolution. These 33 photographs are attached to this inspection report. They are true and representative of the conditions I observed on the date of the CEI.

Records Review

Facilities that generate hazardous waste must calculate the quantity of hazardous waste that they generate each month to establish their generator "size" or "class." The facility's monthly size determines the regulations with which they must comply on a month by month basis. Depending on fluctuations in their generation of hazardous waste, the facility's generator status changes from month to month. Mr. Isaacs indicated that Midwest Generation is aware that their generator size can change, and indicated that they comply with the applicable LQG regulations at those times. Accordingly, during the Records Review portion of the CEI, I completed the Illinois SQG and Used Oil Checklists.

During the Records Review portion of the CEI, I reviewed Midwest Generation's hazardous waste manifests, land disposal restriction forms and annual reports for the last three years (2009 through 2011). Based on my review of the hazardous waste manifests, I confirmed Midwest Generation's status as an episodic LQG, and that the last month that Midwest Generation had been an LQG was September 2010.

Mr. Isaacs provided me with a copy of Midwest Generation's RCRA Facility Plan (Contingency Plan) that was dated August 1, 2011. I asked if he could provide me with copies of records of his training records. During the CEI Mr. Isaacs could not locate his training records, but he forwarded copies on August 22, 2011.

During the Records Review I gave the following documents to Mr. Isaacs: the U.S. EPA OECA Small Business Information Sheet; the U.S. EPA Region 5 List of Pollution Prevention Contacts; and the Illinois Sustainable Technology Center Brochure.

Closing Conference

At the close of the CEI, I summarized my findings. I also indicated that I would send a letter to Midwest Generation, along with the inspection report, checklists and photographs. I concluded the CEI and Mr. Isaacs accompanied me to the Security Office where I returned my visitor pass. I departed Midwest Generation at approximately 11:30 AM.

ATTACHMENT(S):

Inspection Checklists
Photographs (33)

Installation Name: Midwest Generation - Crawford
Date of Inspection: 08 August 2011

Location Address: 3501 S. Pulaski Ave., Chicago, IL
U.S. EPA Inspector: Diane Sharrow

EPA ID Number: ILD044231470

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO SMALL-QUANTITY GENERATORS OF HAZARDOUS WASTE (100 - 1000 KG/MO.)	
	SUBPART A: GENERAL	
	Section 722.111 Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> LDR	722.111
808.121(a)	Has the generator correctly determined if the solid waste it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Not Evaluated
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a) 722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	If "No", proceed to Section 722.120(e).	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.120(e)	Does the generator reclaim waste through a contractual agreement with a recycling facility in which: - the type of waste and frequency of shipments are specified in the agreement? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - the generator has maintained a copy of the agreement for 3 years after termination or expiration of the agreement? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(e)
728.107(a)(10)	Has a small-quantity generator with a tolling (contractual) agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.107(a)(10)
	Section 722.121 Acquisition of Manifests	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
	Section 722.122 Number of Copies	

SQGrin 2011
UOGrin 2010 Sep Only

Changes states 2 once a year during
Part 722 (SQG) - 1 of 7
one month only they are an LLC.

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.122	Does the manifest consist of at least 6 copies? Yes <u>✓</u> No <u> </u> N/A <u> </u>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <u>✓</u> No <u> </u> N/A <u> </u> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <u>✓</u> No <u> </u> N/A <u> </u> - retained one copy as required by Section 722.140(a)? Yes <u>✓</u> No <u> </u> N/A <u> </u> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <u>✓</u> No <u> </u> N/A <u> </u>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <u>✓</u> No <u> </u> N/A <u> </u>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <u> </u> No <u> </u> N/A <u>X</u>	722.123(c)
	SUBPART C: PRE-TRANSPORT REQUIREMENTS Is there any hazardous waste ready for transport off-site? Yes <u> </u> No <u>X</u> N/A <u> </u> If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <u> </u> No <u> </u> N/A <u>X</u>	
(722.134(c))	Section 722.134 Accumulation Time Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words to identify the contents? Yes <u> </u> No <u> </u> N/A <u> </u> Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <u> </u> No <u> </u> N/A <u> </u> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <u> </u> No <u> </u> N/A <u> </u> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <u> </u> No <u> </u> N/A <u> </u>	
(722.134(d))	Has the generator complied with the following requirements: Yes <u> </u> No <u> </u> N/A <u> </u> Note: If the quantity of hazardous waste on-site ever exceeds 6000 kg, the facility is also a storage facility subject to full regulation under Parts 724 and 725 and the permit requirements under Part 703. Does the facility accumulate hazardous waste in containers? Yes <u>X</u> No <u> </u> N/A <u> </u> If "No", go to Subpart J.	

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:
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Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(722.134(a)(2))	Is the accumulation start date marked on each container? Yes _____ No _____ N/A _____	<i>haz. waste en storage or sat. accum</i>
(722.134(a)(3))	Is each container marked with the words "Hazardous Waste"? Yes _____ No _____ N/A _____	
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A _____	
(725.272)	Is the waste compatible with the container and/or liner? Yes _____ No _____ N/A _____	 <i>@ time of insp.</i>
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No _____ N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No _____ N/A _____	
(725.274) *	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes _____ No _____ N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No <input checked="" type="checkbox"/> N/A _____	<i>no drum required of SQG</i> <i>LQG - 3 months in last 3 years?</i>
	Note: If "No", go to Subpart C.	
	COMMENTS:	
	SUBPART J: TANK SYSTEMS	
(722.134(a)(2))	Section 725.301 Generators of 100 to 1000 kg/mo. Is each tank marked with the words "Hazardous Waste"? Yes _____ No _____ N/A _____	<i>no tanks storing or accumulating haz. waste @ time of CFI</i>
725.301(b)(1))	Is the generator in compliance with the treatment or storage of hazardous waste in tanks as referenced in Section 725.117(b)? Yes _____ No _____ N/A _____	

Installation Name:

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Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.301(b)(2))	Have hazardous wastes or treatment reagents been placed in a tank causing the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes _____ No _____ N/A _____	
(725.301(b)(3))	Unless a tank is equipped with drainage control or a diversion structure, do any uncovered tanks have at least 2 feet of freeboard? Yes _____ No _____ N/A _____	
(725.301(b)(4))	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow (i.e. waste feed cutoff system or by-pass system to a stand-by tank)? Yes _____ No _____ N/A _____	
(725.301(c))	Is the generator inspecting, where present, the following: 1) discharge control equipment at least once each operating day? Yes _____ No _____ N/A _____ 2) data from monitoring equipment at least once each operating day? Yes _____ No _____ N/A _____ 3) the level of the waste in the tank at least once each operating day? Yes _____ No _____ N/A _____ 4) physical evidence of corrosion at least weekly? Yes _____ No _____ N/A _____ 5) discharge confinement structures to detect erosion or leaking at least weekly? Yes _____ No _____ N/A _____	
(725.301(d))	Has the generator removed all hazardous waste from tanks and associated equipment and structures upon closure of the facility? Yes _____ No _____ N/A _____	
(725.301(e))	If ignitable or reactive wastes are stored in tanks, is the generator in compliance with Section 725.301(e)? Yes _____ No _____ N/A _____	
(725.301(f))	Is the generator in compliance with the regulations concerning incompatible wastes in Section 725.301(f)? Yes _____ No _____ N/A _____	
<p>COMMENTS:</p> <p>Use SET for primarily lab packs, aerosols, Also have universal waste/asbestos. Manifests 3/11 + 7/11 + LDRs OK</p> <p>SUBPART C: PREPAREDNESS AND PREVENTION</p>		
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <u>X</u> No _____ N/A _____	

Note: In July 2010, had a flood at facility from Canal to basement w/a lot of oils → One time generation.

Installation Name:

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Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.132)	<p>Is the facility equipped with the following if necessary:</p> <p>a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.133)	<p>Is the facility testing and maintaining communication/alarm systems, fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.134)	<p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.135)	<p>Is the facility maintaining adequate aisle space? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(728.107(a)(5))	<p>Section 728.107 Waste Analysis and Recordkeeping</p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Is the plan on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<p><i>no waste on site @ time of CET</i></p> <p><i>Also in RCRA Facility Plan (i.e. Cont. plan) 8/1/11</i></p> <p><i>no waste on site none on manifests</i></p>

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(722.134(d)(5))	<p>A) Is there at least one employee on site or on call with the responsibility to coordinate all emergency response measures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>B) Is the following information posted next to the telephone: - the name and telephone number of the emergency coordinator? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - the location of fire extinguishers and spill control equipment and, if present, fire alarms? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - the number of the fire department unless the facility has a direct alarm? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Have employees received the proper waste handling and emergency procedures training relevant to their positions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) If there have been any emergencies that required a response, did the emergency coordinator comply with the requirements of Section 722.134(d)(5)(D)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><i>none know</i></p> <p>Note: A small-quantity generator who must transport the waste over a distance of 200 miles or more for treatment, storage or disposal may accumulate waste on-site for up to 270 days without a permit provided that the generator complies with the requirements of subsection (d).</p> <p>SUBPART D: RECORDKEEPING AND REPORTING</p> <p>Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>722.140(a)</p>	722.140(a)
722.140(c)	<p>Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	722.140(d)
722.142(b)	<p>Section 722.142 Exception Reporting Has the generator filed an exception report if a signed copy of the manifest has not been received within 60 days of the date of delivery to the transporter? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	722.142(b)
722.143	<p>Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	722.143
722.150	<p>SUBPART E: EXPORTS OF HAZARDOUS WASTE</p> <p>Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	722.150
722.160	<p>SUBPART F: IMPORTS OF HAZARDOUS WASTE</p> <p>Is the generator an importer of hazardous waste? <i>no</i></p>	

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:
Diane Sharrow

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.170	Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.160
	SUBPART G: FARMERS	
	Is the generator a farmer? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.170
	COMMENTS:	

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	PART 739: STANDARDS FOR THE MANAGEMENT OF USED OIL	
	SUBPART B: APPLICABILITY	
	Note: Used oil not exceeding any specification level of Section 739.111 is subject only to Sections 739.172, 739.173 and 739.174(b).	
	Section 739.112 Prohibitions	
739.112(a)	a) Is used oil being managed only in a surface impoundment or waste pile that is regulated under Parts 724 or 725? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.112(a)
739.112(b)	b) Is used oil being used as a dust suppressant? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.112(b)
739.112(c)	c) Is off-spec oil fuel burned for energy recovery in only industrial furnaces identified in Section 720.111, utility boilers, or used oil fired space heaters that meet the provisions of Section 739.123? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.112(c)
	SUBPART C: STANDARDS FOR USED OIL GENERATORS	
	Section 739.121 Hazardous Waste Mixing	
739.121(a)	Is the generator mixing hazardous waste with used oil only as provided in Section 739.110(b)(2)(B) and (C)? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.121(a)
739.121(b)	If "Yes", is the generator of a used oil containing greater than 1000 ppm total halogens managing the used oil as a hazardous waste unless the presumption is rebutted (i.e. analytical data is available)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.121(b)
	Section 739.122 Used Oil Storage	
739.122(a)	Does the generator only store used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.122(a)
739.122(b)	Are containers and aboveground tanks used by a generator (to store used oil) in good condition with no visible leaks? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.122(b)
739.122(c)	Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.122(c)
739.122(d)	Has the generator, upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.122(d)
	Section 739.123 On-Site Burning in Space Heaters	
739.123(a)	Is the generator burning used oil in used oil fired space heaters only when: 1) the heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourselfers (DIY) generators; and 2) the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and 3) the combustion gases from the heater are vented to the ambient air? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.123(a)
	Section 739.124 Off-Site Shipments	
739.124	Has the generator ensured that the used oil is hauled only by transporters that have obtained a USEPA ID # and an IEPA special waste ID # pursuant to Part 809, unless the generator qualifies for an exemption pursuant to Part 739 (self transportation to aggregate points owned by the generator or tolling agreements)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	739.124

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	SUBPART D: STANDARDS FOR USED OIL COLLECTION CENTERS	
739.130(b)	Section 739.130 Do-It-Yourselfer (DIY) Used Oil Collection Centers Does the DIY collection center comply with the generator standards in Subpart C of Part 739? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.130(b)
739.131(b)	Section 739.131 Used Oil Collection Centers Is the used oil collection center in compliance with the generator standards in Subpart C of Part 739 and registered by the Agency to manage used oil? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.131(b)
739.132(b)	Section 739.132 Used Oil Aggregation Points Owned by the Generator Does the owner/operator of a used oil aggregation point comply with all standards in Subpart C of Part 739? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.132(b)
739.141(a)	SUBPART E: STANDARDS FOR USED OIL TRANSPORTER AND TRANSFER FACILITIES Section 739.141 Restrictions on transporters who are not also processors Has the used oil transporter who processes used oil complied with the requirements for processors in Subpart F [except as provided in subsection 739.141(b)]? Yes _____ No _____ N/A _____ Note: Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation.	739.141(a)
739.141(b)	Has the transporter who conducts incidental processing operations that occur in the normal course of transportation (e.g. settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products, complied with the processor requirements in Subpart F? Yes _____ No _____ N/A _____	739.141(b)
739.142(a)	Section 739.142 Notification Has the used oil transporter complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.142(a)
739.143(a)	Section 739.143 Used Oil Transportation Has the used oil transporter delivered all used oil to: 1) another used oil transporter that has a USEPA ID # and an IEPA special waste ID #; or 2) a used oil processing facility that has a USEPA ID # and an IEPA special waste ID #; or 3) an off-spec used oil burning facility that has a USEPA ID # and an IEPA special waste ID #; or 4) an on-spec used oil burning facility? Yes _____ No _____ N/A _____	739.143(a)
739.143(b)	Has the used oil transporter complied with all applicable packaging and labeling, as well as applicable hazardous material regulations of the USDOT regulations of 49 CFR Parts 171 through 180?	739.143(b)
739.143(c)	Has the used oil transporter who has a discharge of used oil taken appropriate actions as outlined in Part 739? Yes _____ No _____ N/A _____	739.143(c)
739.144(a)	Section 739.144 Rebuttable Presumption Has the used oil transporter determined whether the total halogen content of the used oil transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.144(a)
739.144(d)	Has the used oil transporter retained all records of analysis and information used to comply with this Section for at least 3 years? Yes _____ No _____ N/A _____	739.144(d)

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.144(a)	Section 739.144 Rebuttable Presumption Has the used oil transporter determined whether the total halogen content of the used oil transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.144(a)
739.144(d)	Has the used oil transporter retained all records of analysis and information used to comply with this Section for at least 3 years? Yes _____ No _____ N/A _____	739.144(d)
739.145	Section 739.145 Used Oil Storage at Transfer Stations Has the owner/operator of a used oil transfer facility: b) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No _____ N/A _____ c) only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? Yes _____ No _____ N/A _____ d) provided for secondary containment for containers as required by this Subsection? Yes _____ No _____ N/A _____ e) provided for secondary containment for existing aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____ f) provided for secondary containment for new aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____ g) labeled all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes _____ No _____ N/A _____ h) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other material; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No _____ N/A _____	739.145
739.146(a)	Section 739.146 Tracking Has the used oil transporter kept a record of each used oil shipment that includes: 1) the name and address of the generator, transporter, or processor (GTP) who provided the used oil for transport; and 2) the USEPA ID # and IEPA special waste ID # of the GTP that provided the used oil; and 3) the quantity of used oil accepted; and 4) the date accepted; and 5) the signature of a representative of the GTP that provided the used oil? Yes _____ No _____ N/A _____	739.146(a)
739.146(b)	Has the used oil transporter kept a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor, or disposal facility that includes: 1) the name and address of the receiving facility or transporter; and 2) the USEPA ID # and IEPA special waste ID # of the receiving facility or transporter; and 3) the quantity of used oil delivered; and 4) the date of delivery; and 5) the signature of a representative of the receiving facility or transporter? Yes _____ No _____ N/A _____	739.146(b)
739.146(c)	Has the used oil transporter who exports used oil to a foreign country complied with this subsection? Yes _____ No _____ N/A _____	739.146(c)
739.146(d)	Has the used oil transporter retained all records required under this Section for at least 3 years? Yes _____ No _____ N/A _____	739.146(d)

Installation Name:

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U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.147	Section 739.147 Management of Residues Does the used oil transporter who generates residues from the storage or transportation of used oil manage the residues as specified in Section 739.110? Yes _____ No _____ N/A _____	739.147
739.151	SUBPART F: STANDARDS FOR USED OIL PROCESSORS Section 739.151 Notification Has the used oil processor obtained a USEPA ID# and an IEPA special waste ID#? Yes _____ No _____ N/A _____	739.151
739.152(a)	Section 739.152 General Facility Standards Has the owner/operator of a used oil processor and refiner: 1) maintained and operated the facility to minimize the possibility of fire, explosion, or release of used oil; and 2) ensured that he is equipped with the equipment required in this Subsection; and 3) tested and maintained equipment as required; and 4) maintained access to communication or alarm system(s); and 5) maintained the required aisle space; and 6) maintained arrangements with local authorities? Yes _____ No _____ N/A _____	739.152(a)
739.152(b)	Has the owner/operator of a used oil processing and refining facility complied with the following requirements: 1) developed a contingency plan; and 2) ensured that the contingency plan complies with the requirements of this Section; and 3) maintained and submitted to all local authorities copies of the contingency plan and all revisions; and 4) amended the contingency plan as applicable to this Subsection; and 5) ensured that an emergency coordinator is on the premises or on call at all times to meet the requirements of this Subsection; and 6) ensured that emergency procedures meet the requirements of this Subsection? Yes _____ No _____ N/A _____	739.152(b)
739.153	Section 739.153 Rebuttable Presumption Has the used oil processor determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.153
739.154(a)	Section 739.154 Used Oil Management Has the owner/operator of a used oil processor: a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No _____ N/A _____	739.154(a)
739.154(b)	b) stored used oil at a transfer facility only in containers and aboveground tanks that are in good condition with no visible leaks? Yes _____ No _____ N/A _____	739.154(b)
739.154(c)	c) provided secondary containment for containers as required by this Subsection? Yes _____ No _____ N/A _____	739.154(c)
739.154(d)	d) provided secondary containment for existing aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____	739.154(d)
739.154(e)	e) provided secondary containment for new aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____	739.154(e)

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.154(f)	f) labeled or marked containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes _____ No _____ N/A _____	739.154(f)
739.154(g)	g) done the following upon detection of a release of used oil: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No _____ N/A _____	739.154(g)
739.154(h)	h) closed aboveground tanks and containers in accordance with this Section? Yes _____ No _____ N/A _____	739.154(h)
739.155	Section 739.155 Analysis Plan Has the owner/operator of a used oil processing and re-refining facility developed, kept on-site, and followed a written waste analysis plan describing the procedures that will be used to comply with the rebuttable presumption and on-spec Sections of this Part? Yes _____ No _____ N/A _____	739.155
739.156	Section 739.156 Tracking Has the used oil processor kept a record of each used oil shipment accepted for processing (i.e. invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the processor; and 2) the name and address of the generator or processor from whom the used oil was sent for processing; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the processor; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent for processing; and 5) the quantity of used oil shipped; and 6) the date of shipment? Yes _____ No _____ N/A _____	739.156
739.156(b)	Has the used oil processor kept a record of each shipment of used oil that is delivered to a burner, processor, or disposal facility that includes: 1) the name and address of the transporter who delivers the used oil to the burner, processor or disposal facility; and 2) the name and address of the burner, processor, or disposal facility who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivers the used oil to the burner, processor, or disposal facility; and 4) the IEPA special waste ID # of the burner, processor, or disposal facility who will receive the used oil; and 5) the quantity of used oil shipped; and 6) the date of shipment? Yes _____ No _____ N/A _____	739.156(b)
739.156(c)	Have the records described in this Section been maintained for at least 3 years? Yes _____ No _____ N/A _____	739.156(c)
739.157(a)	Section 739.157 Operating Record and Reporting Has the owner/operator kept a written operating record at the facility that contains the following: - records and results of oil analyses performed as described in the analysis plan required under Section 739.155? - summary reports and details of all incidents that require implementation of the contingency plan as specified in Section 739.152(b)? Yes _____ No _____ N/A _____	739.157(a)

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.157(b)	Has the used oil processor reported to the Agency in the form of a letter, on a biennial basis by March 1, the following information: 1) the IEPA special waste ID #, name and address of the processor; and 2) the calendar year covered by the report; and 3) the quantities of used oil accepted for processing and the manner in which the used oil is processed, including the specific processes employed; and 4) the USEPA ID #? Yes _____ No _____ N/A _____	739.157(b)
739.158	Section 739.158 Off-Site Shipments of Used Oil Has the used oil processor who initiates a shipment of used oil off-site used a used oil transporter that has a USEPA ID # and an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.158
739.159	Section 739.159 Management of Residue Does the used oil processor who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A _____	739.159
739.161	SUBPART G: STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY Section 739.161 Restriction on Burning Is off-spec oil fuel burned for energy recovery only in industrial furnaces identified in Section 720.111, utility boilers, used oil fired space heaters that meet the provisions of Section 739.123, or hazardous waste incinerators? Yes _____ No _____ N/A _____	739.161
739.162	Section 739.162 Notification Has the used oil burner complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.162
739.163(a)	Section 739.163 Rebuttable Presumption for Used Oil Has the used oil burner determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.163(a)
739.163(d)	Has the used oil burner retained all records of analyses and information used to comply with this Section for at least 3 years? Yes _____ No _____ N/A _____	739.163(d)
739.164(a)	Section 739.164 Used Oil Storage Has the owner/operator of a used oil burning facility: a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No _____ N/A _____	739.164(a)
739.164(b)	b) used only containers and aboveground tanks that are in good condition, with no visible leaks, to store used oil? Yes _____ No _____ N/A _____	739.164(b)
739.164(c)	c) provided secondary containment for containers as required by this Subsection? Yes _____ No _____ N/A _____	739.164(c)
739.164(d)	d) provided secondary containment for existing aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____	739.164(d)
739.164(e)	e) provided secondary containment for new aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____	739.164(e)

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.164(f)	f) labeled or marked all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes _____ No _____ N/A _____	739.164(f)
739.164(g)	g) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No _____ N/A _____	739.164(g)
739.165(a)	Section 739.165 Tracking Has the used oil burner kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and address of the generator or processor from whom the used oil was sent to the burner; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent to the burner; and 5) the quantity of used oil accepted; and 6) the date of acceptance? Yes _____ No _____ N/A _____	739.165(a)
739.165(b)	Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A _____	739.165(b)
739.166(a)	Section 739.166 Notice Prior to accepting the first shipment of off-spec used oil fuel, has the used oil burner provided to the GTP a one-time written and signed notice certifying that: 1) the burner has notified the Agency stating the location and general description of the used oil management activities; and 2) the burner will burn used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes _____ No _____ N/A _____	739.166(a)
739.166(b)	Has the certification been maintained for at least 3 years from the date the burner last received a shipment of used oil from the GTP? Yes _____ No _____ N/A _____	739.166(b)
739.167	Section 739.167 Management of Residue Does the used oil burner who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A _____	739.167
739.171	SUBPART H: STANDARDS FOR USED OIL FUEL MARKETERS Section 739.171 Prohibitions Has the used oil fuel marketer initiated a shipment of off-spec used oil only to a used oil burner that has a USEPA ID # and an IEPA special waste ID # and burns the used oil in an industrial furnace or boiler as specified in Section 739.161(a)? Yes _____ No _____ N/A _____	739.171
739.172(b)	Section 739.172 On-Spec Used Oil Fuel Has the GTP or burner who claims that the used oil meets the specification for used oil fuel under this Part, kept copies of analyses or other information for at least 3 years? Yes _____ No _____ N/A _____	739.172(b)

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.173(a)	Section 739.173 Notification Has the used oil marketer complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.173(a)
739.174(a)	Section 739.174 Tracking Has the used oil generator kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and address of the burner who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID # of the burner; and 5) the quantity of used oil shipped; and 6) the date of acceptance? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.174(a)
739.174(b)	Has the GTP or burner who claims that the used oil meets the fuel specification under Section 739.111 kept a record of each shipment of used oil to an on-spec used oil burner that includes the following: 1) the name and address of the facility receiving the shipment; and 2) the quantity of used oil fuel delivered; and 3) the date of shipment or delivery; and 4) a cross-reference to the record of used oil analyses or other information used to make the determination that the oil meets the specifications as required under Section 739.172(a)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.174(b)
739.174(c)	Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	739.174(c)
739.175(a)	Section 739.175 Notices Before a used oil GTP directs the first shipment of off-spec used oil to a burner, has the generator obtained a one-time written and signed notice from the burner certifying that: 1) the burner has notified the Agency stating the location and general description of used oil management activities; and 2) the burner will burn the off-spec used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> COMMENTS: <div style="text-align: right; font-style: italic; font-size: 1.5em;">not a Marketer</div>	739.175(a)